



RCRA Compliance Inspection Report

EKA Chemicals

Moses Lake, Washington

WAD98846 8286

May 22, 2017

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7/24/2017
Report Date

Peer Review Signature

7/18/2017
Date

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Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision on compliance with RCRA regulations, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

Section A: Basic Facility and Inspection Information

Facility Information

Handler Name: Eka Chemicals
Handler ID Number: WAD98846 8286
Facility Contact/Title: Lind Bingham, Manager HSE & Logistics
Facility Location Address: 2701 Road N NE, Moses Lake, Washington 98837
Contact Phone Number: (509)765-6400
Contact Email Address: lind.bingham@akzonobel.com
GPS Coordinates of Site: Lat: 47.126121
Long: -119.190354

Inspection Information

Inspection Type: Compliance Evaluation Inspection (CEI)
Inspection Date: May 22, 2017
Arrival Time: 1:10 pm
Departure Time: 3:45 pm
Inspection Team: Jack Boller, EPA
Matt Vojik, EPA

Section B: General Facility Information

Owner/Operator Information: Eka Chemicals is owned by AkzoNobel, Inc. and operated by Eka Chemicals.

Site Location: The facility is located in an industrial area on the east side of Moses Lake, Washington. The surrounding area is mostly rural agricultural land.

Background and Activities: The following information was obtained during the inspection from Mr. Lind Bingham, Manager HSE & Logistics. The facility makes sodium chlorate for use as a bleaching agent for the paper industry. The facility consists of a chlorate production plant, a laboratory that is state certified for water analysis, a maintenance shop, and a paper chemical plant that was shut down and not operating at the time of the inspection. There is also a pond onsite for collecting and evaporating storm water. Once the water in the pond evaporates the solids are cleaned out and tested to determine proper management.

Section C: Regulatory Information

Compliance History: According to RCRAInfo, the facility was last inspected by Washington Department of Ecology on June 19, 2013. Two violations of the State's federally authorized dangerous waste regulations were identified during that inspection. Prior to that they were inspected by Washington Department of Ecology on May 16, 2012. Eight violations of the State's federally authorized dangerous waste regulations were identified during that inspection. Violations involved container management and used oil management.

Regulatory Status: The facility is listed in RCRAInfo as a large quantity generator of dangerous waste. Based on the information on manifests for offsite shipments and the amount of waste observed being generated onsite during the inspection, the facility appeared to be a large quantity generator of dangerous waste. Based on the processes observed during the inspection the facility was not managing any volatile organic waste onsite and was not subject to 40 C.F.R. Part 264 Subparts AA, BB, or CC which the state incorporates by reference. The facility is classified under NAICS Code 32518 (other basic inorganic chemical manufacturing).

Site Hazardous Waste Information: According to RCRAInfo, Eka generates D001 ignitable waste, D002 corrosive waste, and D007 chromium-bearing waste. During the inspection, I also observed that they generate universal waste batteries and used oil.

Section D: Description of Inspection

Purpose of Inspection: The facility was inspected to ensure compliance with Washington's federally authorized dangerous waste regulations found at WAC 173-303. Specifically, the inspection assessed compliance with WAC 173-303-573 universal waste management standards, WAC 173-303-515 requirements for management of used oil, WAC 173-303-170 through 230 standards for dangerous waste generators, and WAC 173-303-690 through 692 standards for air emissions from RCRA units.

Inspection Entry and Opening Conference: At 1:10 pm on May 22, 2017, the inspection team arrived at the Eka Chemicals facility. We entered the office and identified ourselves to the receptionist. She contacted Mr. Bingham to let him know that we were there. In a few minutes Mr. Bingham came and escorted us to a conference room.

We presented our credentials and explained that we were there to conduct a dangerous waste inspection. Mr. Bingham provided a short presentation giving an overview of the production process and waste management activities conducted at the facility. He said that the only production process was the sodium chlorate process. He said that the paper chemicals operation was shut down and no longer operating. He said that the facility produces approximately 5,200 tons of sodium chlorate per month, which results in the generation of large quantities of dangerous waste electrolyte filter sludge.

We ended the opening conference.

Inspection Summary: We took a tour of the facility. Mr. Bingham provided us with proper protective clothing and accompanied us on the tour. During the tour, we looked at the facility's processes, dangerous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as dangerous. We also observed the facility's universal waste and used oil management. Specifically, we inspected the following areas:

- Maintenance Shop – I observed five containers of universal waste batteries, a drum used to accumulate used aerosol cans, and a drum used to accumulate dirty rags. There was also a parts washer in the shop that Mr. Bingham said was serviced by Safety Kleen. Outside of the shop was an area for collecting used oil. I observed two drums of used oil sitting on a spill pallet.

- Production Building – In the less than 90-day accumulation area I observed a box in a super sack that contained hazardous waste filter sludge and debris. I also observed a drum holding waste from titrations being conducted in the laboratory.
- Process Laboratory – I observed two small satellite accumulation containers for lab waste and a trash can used as a satellite accumulation container for contaminated debris.
- Storm Pond – I observed that the pond is lined and the water level was approximately four feet below the top of the side walls.
- Overflow 90-day area – I observed a yellow plastic bin outside of the paper chemicals building. It contained two totes that held oily water and sludge from the cleanup of a spill.
- Paper Chemicals Building – This plant was shut down and being used as a warehouse. I did not observe any waste in the building.

Following the tour, I reviewed manifests for the last year, the contingency plan, inspection logs, waste profiles, and training records.

Only those areas in which I observed potential compliance concerns or noted other pertinent issues are discussed in this inspection report.

In the maintenance shop I observed that the accumulation start date was not recorded for one of the four containers of universal waste batteries (Photo P1030043).

Outside of the maintenance shop I observed containment pallets holding drums of used oil (Photo P1030050). I observed that the pallets were approximately half full of used oil (Photo P1030050). Mr. Bingham said that drips of oil collect in the pallets during the process of adding oil to the drums. When the pallets start to fill up, the oil is pumped into one of the drums. I explained that if the facility was accumulating used oil in the pallets for an extended period of time, the pallets were considered containers of used oil and needed to be labeled as used oil. He then summoned someone who labeled the pallets during the inspection.

As we were walking to the stormwater pond, I observed an aerosol can laying on the ground (Photo P1030058). The tip was broken off of the can (Photo P1030063), which felt like it was one third to one half full. According to the label, the can contained contact adhesive. In this same area I observed that there was a second similar can in a trash bin (Photo P1030064). Mr. Bingham retrieved both cans and gave them to someone to put in the used aerosol accumulation drum.

As we were walking from the pond to the paper chemicals building, I observed an open metal bin that contained a white crystalline material mixed with what appeared to be soil (Photo P1030060). Mr. Bingham said that the bin contained residue from the cleanout of a salt pit and this residue was not hazardous waste. He summoned someone to remove the residue from the bin and place it in closed containers.

Closing Conference: During the closing conference, I discussed the lack of a start date for the one container of universal waste batteries and the need for a used oil label on the spill pallets in the used oil collection area. I explained our procedure for completing a report and potential follow up options, including formal enforcement. We concluded the inspection and left the facility at 3:45 pm.

ATTACHMENT A

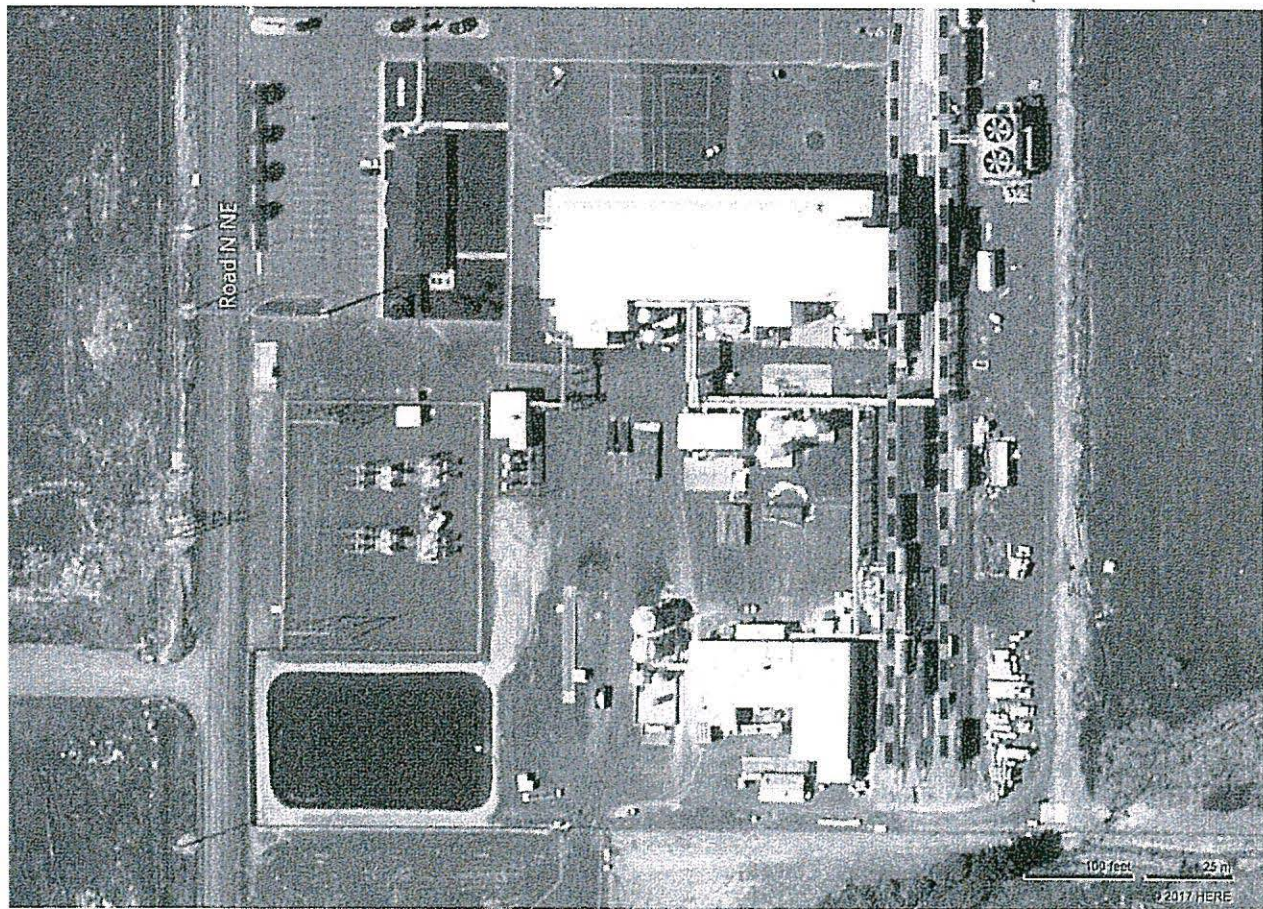
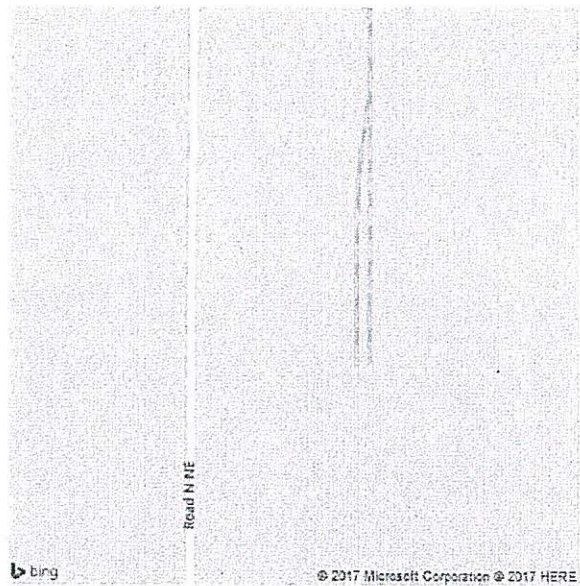
Aerial Photo

Eka Chemicals
WAD98846 8286

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Notes



ATTACHMENT B

Photo Log

Eka Chemicals
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Photo log for Akzo Nobel DBA Eka Chemicals

RCRA ID # WAD98846 8286

(all photos taken by Matt Vojik on May 22, 2017 using a Panasonic DMC-FH25 camera)

- P1030042 – Universal waste accumulation area in the maintenance building
- P1030043 – Open container of universal waste alkaline batteries in the maintenance building
- P1030044 – View inside the open container of universal waste alkaline batteries in the maintenance building
- P1030045 – Universal waste accumulation area in the maintenance building
- P1030046 – Hazardous waste containers labeled as “Used Rags” and “Used Aerosols” in the maintenance building
- P1030047 – View under the lid of the parts washer in the maintenance building
- P1030048 – Used oil accumulation area outside the maintenance building
- P1030049 – Detail view of spilled oil in the spill control pallets under the used oil accumulation containers outside the maintenance building
- P1030050 – Used oil accumulation area outside the maintenance building
- P1030051 – Detail view of spilled oil in the spill control pallets under the used oil accumulation containers outside the maintenance building
- P1030052 – Container labeled as hazardous waste “Electrolyte Filter Sludge/Media/Debris” in the production building
- P1030053 – Container labeled as hazardous waste “Electrolyte Filter Sludge/Media/Debris” in the production building
- P1030054 – Less than 90-day accumulation container of hazardous laboratory titration waste in the production building
- P1030055 – Satellite accumulation container of hazardous titration waste in the process laboratory located in the production building
- P1030056 – Satellite accumulation container of hazardous titration waste in the production laboratory located in the production building
- P1030057 – Container labeled as hazardous sodium chlorate contaminated waste in the production laboratory located in the production building
- P1030058 – Discarded aerosol can on the pavement between the production building and the paper chemicals building
- P1030059 – Stormwater collection pond
- P1030060 – Open dumpster of non-hazardous salt brine sludge located outside the paper chemicals building
- P1030061 – Containers of non-hazardous oily waste in the less than 90-day accumulation area located outside the paper chemicals building
- P1030062 – View of the less than 90-day accumulation area located outside the paper chemicals building
- P1030063 – Detail view of the discarded aerosol can found on the pavement between the production building and the paper chemicals building. The can was missing a spray nozzle and contained “3M HI-STRENGTH 90 Contact Adhesive.”
- P1030064 – An empty aerosol can of “3M HI-STRENGTH 90 Contact Adhesive” in a garbage can located outside between the production building and the paper chemicals building



P1030042.JPG



P1030043.JPG



P1030044.JPG



P1030045.JPG



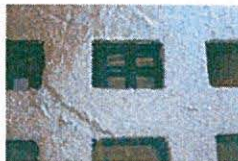
P1030046.JPG



P1030047.JPG



P1030048.JPG



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